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June 22, 2001

VIA FACSIMILE AND FIRST CLASS MAIL

(916) 653-9040

Robert Pernell, Commissioner
California Energy Commission
1516 9th Street
Sacramento, California 95814

VIA FACSIMILE AND FIRST CLASS MAIL

(916) 653-3478

Arthur H. Rosenfeld, Ph.D., Commissioner
California Energy Commission
1516 9th Street
Sacramento, California 95814

Re: Tyco Adhesives

Dear Commissioners Pernell and Rosenfeld:

This firm represents Tyco Adhesives in connection with the hearing held on June 14, 2001 to address concerns raised by Tyco Adhesives about the new California Energy Commission (CEC) regulations imposing new requirements on the use of cloth backed rubber adhesive tapes. Tyco Adhesives expects to submit further technical evidence to support the testimony provided to the CEC.

The CEC regulations require the use of mastic, in addition to a mechanical fastener, for the use of cloth backed rubber adhesive tape. Tyco Adhesives presented evidence and field testimonials which shows that the duct closure system of cloth backed rubber adhesive, when applied according to the Underwriters Laboratory standards and manufacturers specifications (with a mechanical fastener), more than adequately prevents air leakage from

Robert Pernell, Commissioner
Arthur H. Rosenfeld, Ph.D., Commissioner
June 22, 2001
Page 2

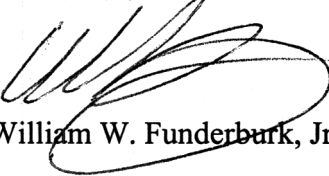
ducts. Tyco Adhesives recognizes the CEC's concern about the use of certain cloth backed rubber adhesives that are not applied according to specifications and believes that this issue can be addressed through enforcement of existing regulations.

Rather than engage in a total recapitulation of the arguments, Tyco Adhesives suggests the following productive steps to resolve this matter:

1. Test the duct closure system (tape plus mechanical fastener) per UL and manufacturers specifications according to the Lawrence Berkeley National Laboratories test set forth by Dr. Sherman at the June 14, 2001 hearing. Tyco Adhesives would be allowed to observe these tests.
2. If these tests show that the tape duct closure system is satisfactory, stay the implementation of the regulation for three (3) years to allow LBNL and the cloth backed rubber adhesive tape industry to produce a satisfactory, improved substitute adhesive and to obtain regulatory approvals for such adhesive.

We look forward to the CEC's response to this proposal. If you have any questions or comments, please feel free to contact the undersigned.

Very truly yours,



William W. Funderburk, Jr.

WWF:ro

cc: Jerry Serra, Ph.D., Tyco Adhesives
Bill Pennington, California Energy Commission
Michal C. Moore, Ph.D., Commissioner, California Energy Commission
Robert A. Laurie, Commissioner, California Energy Commission
Timothy B. Jensen, Ph.D., 3M
Bob Turner, Shurtape Technologies, Inc.
Graham James, Intertape Polymer Group Inc.

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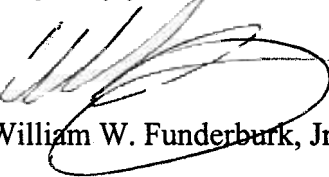
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